

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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UNITED STATES STEEL CORPORATION,	:	
NIPPON STEEL CORPORATION, and NIPPON	:	Civil Action No.: 2:25-cv-15
STEEL NORTH AMERICA, INC.,	:	
	:	
Plaintiffs,	:	
	:	JURY TRIAL DEMANDED
vs.	:	
	:	
CLEVELAND-CLIFFS INC., LOURENCO	:	
GONCALVES, and DAVID McCALL,	:	
	:	
Defendants.	:	
-----X		

**MOTION FOR LEAVE TO FILE REPLY
IN SUPPORT OF MOTION FOR EXPEDITED PROCEEDINGS**

Plaintiffs United States Steel Corporation (“U. S. Steel”), Nippon Steel Corporation, and Nippon Steel North America, Inc. (collectively, “Plaintiffs”) seek leave of Court to file a reply in support of their Motion for Expedited Proceedings (Doc. No. 4).

Neither Plaintiffs' Motion for Expedited Proceedings nor Defendants' oppositions address significant factual developments that occurred this week. These include new attempts to interfere with the Merger, including lies and aggressive personal attacks leveled against Plaintiffs by Defendant Lourenco Goncalves, as well as the announcement by Defendant Cleveland-Cliffs Inc. of a new effort to monopolize critical steel markets by acquiring U. S. Steel. These developments directly bear on the illegal conduct about which Plaintiffs seek expedited discovery, and Plaintiffs seek to bring them to the Court's attention in a reply.

Further, Defendants' oppositions advance several incorrect arguments, including ones that evince critical misunderstandings of both the D.C. Circuit litigation and the purpose for which

Plaintiffs seek expedited discovery. Plaintiffs submit that a short reply correcting them would aid the Court's consideration of Plaintiffs' Motion for Expedited Proceedings.

Defendants filed two opposition briefs totaling 30 pages. For the foregoing reasons, Plaintiffs respectfully request the Court grant them leave jointly to file the attached ten-page Reply in Support of their Motion for Expedited Proceedings.¹

¹ By advance agreement with counsel for Defendants, Plaintiffs are filing this by noon today.

January 16, 2025

Respectfully submitted,

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